

**Before the
Federal Communications Commission
Washington, D.C.**

In the matter of:

Revitalization of the AM Radio Service)	
)	MB Docket No. 13-249
Second Further Notice of Proposed)	
Rulemaking)	

COMMENTS OF K-ZONE MEDIA GROUP, LLC, LICENSEE OF WPKZ FITCHBURG, MA

K-Zone Media, licensee of WPKZ AM1280 in Fitchburg, MA supports the efforts of the Commission to reduce protections for distant Class A stations that adversely impact the ability of Class B-D stations like WPKZ to effectively serve our regular local daytime listeners during critical hours and at night.

In as much as improved night time local service is encouraged and is much appreciated, as important is the impact on small local stations like WPKZ of requirements to adjust to different night time rules and the resources that effort diverts from important operations of our station and others like us to service our local communities day and night. WPKZ radio broadcasts at 5,000 watts on a two tower pattern by day, and switches to a 3 tower night pattern at 1000 watts to protect distant stations in NY and PA.

This broadcast design arising from interference protections diverts resources through requiring K-Zone Media to make essentially a 50% greater investment in towers and maintenance to broadcast at 20% of the power at night as we are licensed during daytime.

The ability to maintain our day pattern at night would allow resources to be more effectively employed in improved local service thru expanding the current 20-25 hours of weekly live WPKZ staffed broadcast hours, expanded investments in studio operations and staff and further activities in local marketing and community outreach.

Exhibit A illustrates the challenges of converting to a single pattern day and night, as the design for a modified day pattern that could satisfy night protections on a single broadcast tower array and pattern would still result in a reduction of day time power to 4000 watts and a reduction of the nighttime power to 700 watts. This could be considered a viable option as it reduces tower maintenance by a 1/3 and reduces replacement costs on phaser equipment as it ages and is replaced.

We believe the changes proposed by the Commission should also allow us to achieve power levels day and night on a single broadcast pattern pattern closer to what we are currently operating as a two pattern design, and we support the Commissions efforts to help stations like us in this matter. I would encourage the Commission to go further in reducing the night protection impacts on stations like WPKZ by putting a floor on the night time power reductions required to no less than one half of daytime power levels for stations like WPKZ that broadcast at no more than 5000 watts during the day. And we would propose this reduction to 50% power approach at night or during critical hours apply to protection to stations of any class that are in markets over 100 miles away. In our case we are protecting a Class B station WADO in New York City. The benefit to WPKZ would be to allow us to design a more efficient tower array and pattern that permits us to employ a single day-night pattern broadcasting at our daytime licensed 5,000 watts and no less than 2,500 watts at night, which would actually improve our night-time local service which is particularly important during our local winters when the important early morning and late afternoon drive times can occur in the dark as sunrise can be as late as 7:17am and sunset as early as 4:13pm.

And in considering the Commission's request for comment "as to alternatives that would minimize burdens on small entities." A simple approach to nighttime patterns and protections for small entities would be to allow a small entity to seek authorization for a nighttime pattern and power level without consideration of co-channel or adjacent channel station interference if (i) the small entities 2.0 mV/m AM pattern is completely within a 25 mile radius of its broadcast towers and city of license (ii) its night time power level does not exceed 4000 watts, and (iii) there is no 0.5 mV/m night-time co-channel pattern within a 25 mile "protected" small entity coverage area.

This approach would certainly assist one small entity AM broadcaster in Massachusetts and certainly many others, and potentially reduce the increasing rate of commercial AM stations

going silent in 2018. As of 12/31/2018, I counted 90 AM stations that had been silent for over 2 months listed on the FCC Silent Station web page.

Respectfully Submitted,

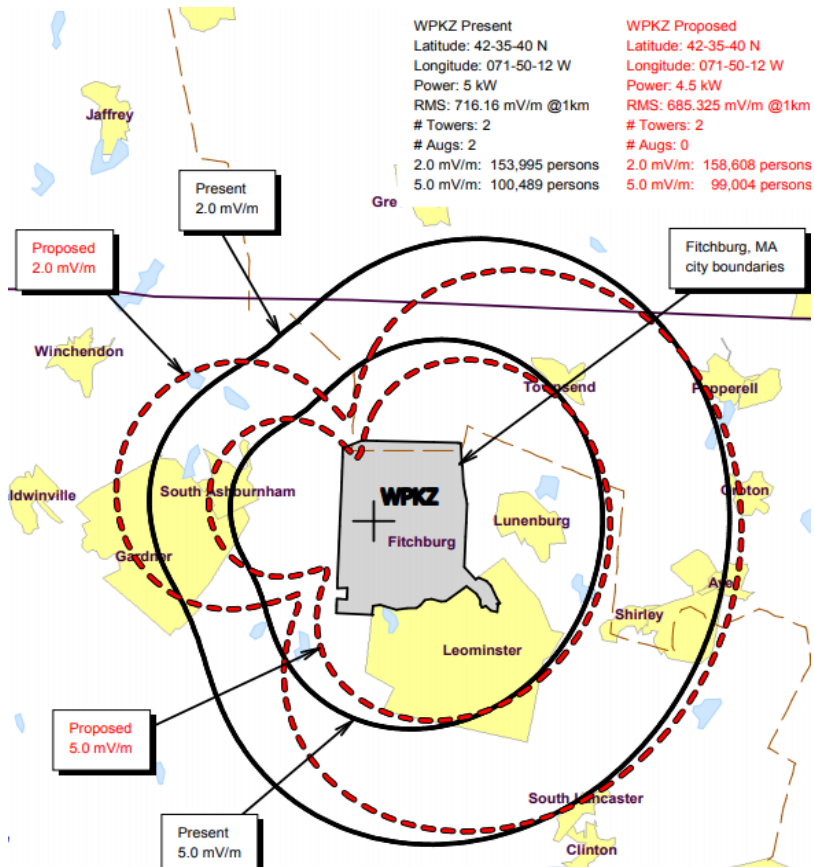
January 21, 2019

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EXHIBIT A

REVISED DAYTIME IN RED



REVISED NIGHTTIME (BLUE)

